

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON**

**B.P.J., by her next friend and mother,  
HEATHER JACKSON,**

**Plaintiff,**

**v.**

**Civil Action No. 2:21-cv-00316  
Honorable Joseph R. Goodwin**

**WEST VIRGINIA STATE BOARD OF  
EDUCATION; HARRISON COUNTY  
BOARD OF EDUCATION; WEST  
VIRGINIA SECONDARY SCHOOL  
ACTIVITIES COMMISSION; W.  
CLAYTON BURCH, in his official  
capacity as State Superintendent; and  
DORA STUTLER, in her official capacity  
as Harrison County Superintendent,**

**Defendants.**

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of foregoing “**Defendant West Virginia State Board of Education and Superintendent W. Clayton Burch’s Responses to Plaintiff’s First Set of Interrogatories to Defendants State Board of West Virginia and W. Clayton Burch**” was served upon the following parties through the Court’s Electronic Case Filing (ECF) system on this day, Monday, November 22, 2021:

Loree Stark  
American Civil Liberties Union of West Virginia Foundation  
P.O. Box 3952  
Charleston, WV 25339-3952  
[lstark@acluwv.org](mailto:lstark@acluwv.org)  
*Counsel for Plaintiff*

Avatara Smith-Carrington  
Lambda Legal  
3500 Oak Lawn Avenue, Suite 500  
Dallas, TX 75219  
[asmithcarrington@lambdalegal.org](mailto:asmithcarrington@lambdalegal.org)  
*Counsel for Plaintiff*

Carl Charles  
Tara Borelli  
Lambda Legal  
730 Peachtree Street NE, Suite 640  
Atlanta, GA 30308-1210  
[ccharles@lambdalegal.org](mailto:ccharles@lambdalegal.org)  
*Counsel for Plaintiff*

Sruti Swaminathan  
Lambda Legal  
120 Wall Street, 19th Floor  
New York, NY 10005  
[sswaminathan@lambdalegal.org](mailto:sswaminathan@lambdalegal.org)  
*Counsel for Plaintiff*

Joshua Block  
Taylor Brown  
Chase Strangio  
American Civil Liberties Union Foundation  
125 Broad Street  
New York, NY 10004  
[jblock@aclu.org](mailto:jblock@aclu.org)  
*Counsel for Plaintiff*

Kathleen Hartnett  
Julie Veroff  
Cooley LLP  
101 California Street 5th Floor  
San Francisco, CA 94111-5800  
[khartnett@cooley.com](mailto:khartnett@cooley.com)  
*Counsel for Plaintiff*

Elizabeth Reinhardt  
Cooley LLP  
500 Boylston Street, 14th Floor  
Boston, MA 02116-3736  
[ereinhardt@cooley.com](mailto:ereinhardt@cooley.com)  
*Counsel for Plaintiff*

Andrew Barr  
Cooley LLP  
1144 15th St., Suite 2300  
Denver, CO 80202-5686  
[abarr@cooley.com](mailto:abarr@cooley.com)  
*Counsel for Plaintiff*

Katelyn Kang  
Cooley LLP  
55 Hudson Yards  
New York, NY 10001-2157  
[kkang@cooley.com](mailto:kkang@cooley.com)  
*Counsel for Plaintiff*

Roberta F. Green  
Shuman McCuskey & Slicer PLLC  
P.O. Box 3953  
Charleston, WV 25339-3953  
[rgreen@Shumanlaw.com](mailto:rgreen@Shumanlaw.com)  
*Counsel for Defendant West Virginia Secondary School Activities Commission*

Susan L. Deniker  
Steptoe & Johnson PLLC  
400 White Oaks Boulevard  
Bridgeport, WV 26330  
[susan.deniker@steptoe-johnson.com](mailto:susan.deniker@steptoe-johnson.com)  
*Counsel for Defendants Harrison County Board of Education and Dora Stutler*

Douglas P. Buffington, II  
Curtis R. A. Capehart  
Office of the Attorney General, State of West Virginia  
State Capitol Complex  
Building 1, Room E-26  
Charleston, WV 25305-0220  
[Curtis.R.A.Capehart@wvago.gov](mailto:Curtis.R.A.Capehart@wvago.gov)  
*West Virginia Attorney General's Office*

Whitney M. Pellegrino  
Aria S. Vaughan  
Michelle L. Tucker  
Amanda K. Dallo  
United States Department of Justice  
Civil Rights Division  
Educational Opportunities Section  
950 Pennsylvania Ave., NW  
4CON, 10th Floor  
Washington, DC 20530  
[Aria.Vaughan@usdoj.gov](mailto:Aria.Vaughan@usdoj.gov)  
*United States Department of Justice*

Lisa G. Johnston  
Fred B. Westfall, Jr.  
Jennifer M. Mankins  
300 Virginia Street East, Room 4000  
Charleston, WV 25301  
[Fred.Westfall@usdoj.gov](mailto:Fred.Westfall@usdoj.gov)  
*United States Attorney's Office*

**/s/ Kelly C. Morgan**  
**Kelly C. Morgan (WV Bar #9519)**  
**Michael W. Taylor (WV Bar #11715)**  
**Kristen V. Hammond (WV Bar #9727)**  
**Bailey & Wyant, PLLC**  
**500 Virginia Street, East, Suite 600**  
**P.O. Box 3710**  
**Charleston, WV 25337-3710**  
**Telephone: 304.345.4222**  
**Facsimile: 304.343.3133**  
**[kmorgan@baileywyant.com](mailto:kmorgan@baileywyant.com)**  
**[mtaylor@baileywyant.com](mailto:mtaylor@baileywyant.com)**  
**[khammond@baileywyant.com](mailto:khammond@baileywyant.com)**